

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA)
)
v.) CASE NO: 4:22-CR-016
)
SHAQUANDRA WOODS and)
KENNETH JACKSON)

UNITED STATES' MOTION TO MODIFY TRIAL DATE TO NOVEMBER 27,
2023

COMES NOW the United States, by and through United States Attorney Jill E. Steinberg, and moves the Court to begin the trial of the above-captioned case on November 27, 2023, versus November 28, 2023.

On February 21, 2023, the government provided defense counsel, via letter, notice of its intent to call Alfonso Olivas, SBA Supervisory Loan Specialist, as a witness at trial. While the government believes Mr. Olivas' testimony to be that of a percipient fact witness, it nevertheless provided a detailed summary of his expected testimony, a copy of his *curriculum vitae*, and other information required by Fed.R.Crim.P. 16(a)(1)(G).

Trial of this case is currently scheduled for Tuesday, November 28, 2023. Mr. Olivas, however, is scheduled to testify that week in the specially set trial of *United States v. Eric Dean Sheppard*, No. 1:22-cr-20290 (S.D. Fla.), doc. 112. After speaking with the Assistant U.S. Attorney trying the case in the Southern District of Florida, undersigned counsel does not believe the *Sheppard* matter will be resolved with a negotiated plea agreement. Based upon the AUSAs' orders of proof, it appears Mr.

Olivas can be available to testify in both trials if the Court begins the above-captioned trial on Monday, November 27, 2023.

Therefore, the government respectfully requests the Court to reschedule the trial of this matter to begin at 9:00 a.m. on November 27, 2023. Defense counsel does not join in this motion.

Respectfully submitted, this 23rd day of October 2023.

JILL E. STEINBERG
UNITED STATES ATTORNEY

/s/ Jennifer G. Solari

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CERTIFICATE OF SERVICE

This is to certify that I have on this day served all the parties in this case in accordance with the notice of electronic filing (“NEF”) which was generated as a result of electronic filing in this Court.

This 23rd day of October 2023.

Respectfully submitted,

JILL E. STEINBERG
UNITED STATES ATTORNEY

/s/ Jennifer G. Solari
Jennifer G. Solari
Assistant United States Attorney